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14 **IN THE UNITED STATES BANKRUPTCY COURT**  
15 **FOR THE DISTRICT OF ARIZONA**

16 In re:

17 FARWEST PUMP COMPANY,

18 Debtor.

Chapter 11 Proceedings

Case No. 4:17-bk-11112-BMW

**APPLICATION FOR ORDER  
TO SHOW CAUSE**

19 The Official Committee of Unsecured Creditors (the “Committee”), through  
20 undersigned counsel, respectfully requests entry of an Order to Show Cause why Debtor  
21 and/or its counsel should not be sanctioned for failing to comply with the Court’s order to  
22 prepare and file a Periodic Report [Form 426] for each of the Debtor’s related entities.<sup>1</sup> The  
23 reports were to be reviewed by Debtor’s financial advisor, Ted Burr, prior to filing, and were  
24 to be filed on or before the 20th day of the month following the conclusion of each calendar  
25 quarter. To date no reports have been filed.

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<sup>1</sup> Reliant Well Drilling and Pump Corporation, Inc., FARCO Perforaciones y Bombeo, S.A. de C.V., and Vaught Equipment, LLC.

1 At the January 16, 2020, hearing on the Committee's Renewed Motion for Standing,  
2 the Court indicated its concern that there had been a lack of disclosure from the Debtor to  
3 requests from the Committee for financial information relating to the enforcement of the  
4 Debtor's leases with its related entities. At the hearing the Court indicated it would provide  
5 protective measures to safeguard the finances of the Debtor pending the outcome of the BAP  
6 appeal. The Court instructed the parties to upload an order.  
7

8 Over the course of the next few months the parties were unable to agree on wording for  
9 the proposed Order. A Stipulated Order was eventually entered on June 3, 2020 [DE 743]  
10 requiring the Debtor to file periodic reports for the related entities. To date the Debtor has  
11 failed to comply with that Order.  
12

13 The Committee's counsel has repeatedly reached out to counsel for the Debtor with no  
14 success. Most recently counsel for the Committee emailed Debtor's counsel advising of a  
15 deadline of Friday, August 21, 2020, to file the reports; unfortunately, counsel never  
16 responded, thus prompting this filing.  
17

18 The Committee respectfully requests entry of an order to show cause why Debtor and/or  
19 Debtor's counsel should not be sanctioned for their refusal to comply with the Court's Order.  
20

21 DATED this 24th day of August 2020.

22 **GERALD K. SMITH AND JOHN C. SMITH**  
23 **LAW OFFICES, PLLC**

24 By: s/ John C. Smith

25 John C. Smith

26 *Attorneys for Committee of Unsecured Creditors*  
27  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 24, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing and additionally e-mailed copies of the attached document to the following ECF registrants:

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